

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, *ex rel.* W.A. DREW  
EDMONDSON, in his capacity as ATTORNEY  
GENERAL OF THE STATE OF OKLAHOMA,  
*et al.*

Plaintiffs

vs.

TYSON FOODS, INC., *et al.*

Defendants

05-CV-00329-TCK-SAJ

CAL-MAINE FARMS, INC.'S AMENDED RESPONSES  
TO THE PLAINTIFFS' FIRST SET OF INTERROGATORIES

Cal-Maine Farms, Inc. submits its amended responses to the plaintiffs' First Set of  
Interrogatories as follows:

Objection:

The Instructions and Definitions drafted by the plaintiffs render the discovery requests generally overbroad, burdensome, and oppressive. Responses to the discovery requests will be controlled by the Federal Rules of Procedure rather than by the instructions drafted by the plaintiffs. The definitions drafted by the plaintiffs are artificial, tendentious, and in certain instances simply wrong. These responses will accord words in the discovery requests their ordinary meanings.

Interrogatory No. 1: For each of your poultry growing operations in the IRW since 1952, please provide the following information:

- a. name and physical location of the operation;
- b. dates of operation;
- c. type of operation (breeder, broiler, layer, etc.)
- d. number of birds (aggregated annually) at each location; and

e. name of the owner and operator.

Response:

None.

Respectfully submitted,

CAL-MAINE FARMS, INC.

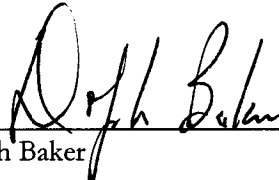
by: s/ Robert E. Sanders  
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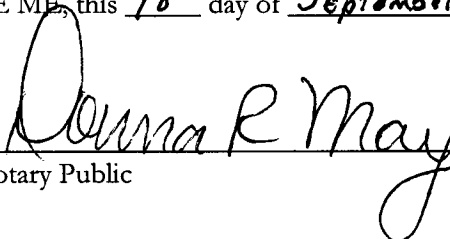
VERIFICATION

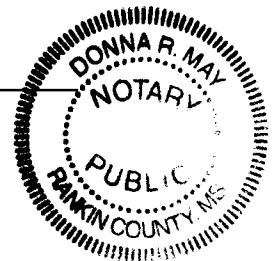
STATE OF MISSISSIPPI  
COUNTY OF HINDS

PERSONALLY APPEARED BEFORE ME, the undersigned authority for the jurisdiction aforesaid, Dolph Baker, who, being first duly sworn on oath, states as a representative of Cal-Maine Farms, Inc., that the foregoing Amended Responses to Plaintiffs' First Set of Interrogatories are verified as true to the best of his knowledge, information, and belief:

  
\_\_\_\_\_  
Dolph Baker

SWORN AND SUBSCRIBED BEFORE ME, this 18 day of September, 2006

  
\_\_\_\_\_  
Notary Public



My Commission Expires:

**MY COMMISSION EXPIRES MAY 8, 2008**